

KELLER / ANDERLE LLP  
Jennifer L. Keller (SBN 84412)  
jkeller@kelleranderle.com  
Chase A. Scolnick (SBN 227631)  
cscolnick@kelleranderle.com  
Jay P. Barron (SBN 245654)  
jbarron@kelleranderle.com  
18300 Von Karman Ave., Suite 930  
Irvine, California 92612  
Tel.: (949) 476-8700

*Counsel for Moving Party Kevin  
Spacey Fowler a/k/a Kevin Spacey*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

KEVIN SPACEY FOWLER a/k/a	)	Case No. 2:22-mc-00030
KEVIN SPACEY,	)	
	)	<i>Pending in the Southern District of</i>
Moving Party,	)	<i>New York, Case No. 1:20-cv-09586-LAK</i>
	)	
v.	)	<b>KEVIN SPACEY FOWLER'S NOTICE</b>
	)	<b>OF MOTION AND MOTION TO</b>
	)	<b>COMPEL AND FOR CONTEMPT RE</b>
ADAM VARY	)	<b>ADAM VARY'S DEPOSITION AND</b>
	)	<b>RESPONSE TO SUBPOENA</b>
Responding Party.	)	<b>SEEKING PRODUCTION OF</b>
	)	<b>DOCUMENTS</b>
	)	
	)	Judge: TBD
	)	Hearing Date: March 2, 2022
	)	Hearing Time: 9:30 a.m.
	)	
	)	Discovery Cutoff Date: January 18, 2022
	)	Pretrial Conference Date: N/A
	)	Trial Date: February 18, 2022
	)	

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that on March 2, 2022, at 9:30 a.m., or as soon thereafter as the matter may be heard in the United States District Court, Central District of California, located at Royal Federal Building, 255 East Temple Street, Los Angeles, California 90012, moving party Kevin Fowler a/k/a Kevin Spacey Fowler (“Mr. Fowler” or “Moving Party”) through his undersigned counsel, will and hereby does, move the Court for an order compelling responding party Adam Vary (“Mr. Vary”) to (1) sit for a supplemental deposition to answer all questions he refused to answer at his initial deposition, plus all reasonable follow up questions, and (2) product all responsive documents and information sought by Mr. Fowler’s Subpoena to Produce Documents, Information, or Objects, or to Permit Inspection of Premises in a Civil Action. This Motion is made following several conferences of counsel pursuant to C.D. Cal. Local Rule 37-1 which took place on January 10, 2022, and January 18, 2022.

The Motion is made on the grounds that Mr. Vary unreasonably and improperly refused to answer questions or produce documents at his deposition or in response to the subpoenas. Mr. Vary’s objections, including based on the “reporter’s privilege” under the First Amendment and the “reporter’s shield” under California law, are inapplicable and/or do not justify the refusal to provide the requested discovery.

This motion will be based upon this Notice of Motion and Motion, the accompanying Joint Stipulation under C.D. Cal. Local Rule 37-2, the supporting declaration of Chase Scolnick, and such additional material as may be considered at the hearing.

Dated: January 31, 2022  
Irvine, California.

Respectfully submitted,

/s/ Chase A. Scolnick

Jennifer L. Keller  
Chase A. Scolnick  
Jay P. Barron

KELLER/ANDERLE LLP  
18300 Von Karman Ave., Suite 930  
Irvine, California 92612  
Tel: (949) 476-8700  
Fax: (949) 476-0900  
Email: jkeller@kelleranderle.com  
cscolnick@kelleranderle.com  
jbarron@kelleranderle.com

*Counsel for Plaintiff Kevin Spacey  
Fowler a/k/a Kevin Spacey*